

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF OKLAHOMA**

1. DR. LESLIE HANNAH,

Plaintiff,

v.

1. NORTHEASTERN STATE UNIVERSITY,
2. DR. BRIAN COWLISHAW,
3. DR. DONNA SHELTON,
4. DR. D. AUDELL SHELBURNE,
5. DR. PHILLIP BRIDGMON,
6. DR. STEVE TURNER, and
7. DR. WILLIAM RUGG,

Defendants.

Case No.: 14-CV-74-KEW

(Cherokee County
Case No.: CJ-2014-00010)

DEFENDANTS' NOTICE OF REMOVAL

COME NOW, Defendants, Bridgmon, Cowlshaw, Shelburne, Shelton, and Turner and files this, their Notice of Removal of the above styled cause of action from the District of Cherokee County, Oklahoma to the United States District Court for the Eastern District of Oklahoma. In compliance with Title 28 U.S.C. § 1446, these Defendants state:

I.

JURISDICTION

On January 10, 2014, Plaintiff filed a Petition against the Defendants claiming violation of Rule 42 U.S.C.A. § 1981 and state common law claims. Removal is appropriate under Title 28 U.S.C. § 1441(a). Jurisdiction lies under Title 28 U.S.C.A. § 1331.

II.

ALL PROPERLY SERVED DEFENDANTS CONSENT

All properly served Defendants consent to removal. Rule 28 U.S.C.A. § 1446(b)(2)(A). This Notice of Removal is filed within thirty (30) days of receipt of the Original Petition and is therefore timely. Title 28 U.S.C. § 1446(b).

III.

NOTICE TO STATE COURT AND ADVERSE PARTIES

Attached hereto as Exhibit “1” is the Summons to each Defendant, along with the service envelope. Attached hereto as Exhibit “2” is the Petition. The Cherokee County Docket Sheet is attached hereto as Exhibit “3.” The Defendants are represented by the same counsel, Assistant Attorney General Susan Werner. The state court and all adverse parties (Plaintiff’s counsel, Anthony L. Allen) have been served with this Notice of Removal. Title 28 U.S.C. § 1446.

Respectfully submitted,

s/ Susan Werner

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CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2014, a true and correct copy of this document was delivered via U.S. mail, postage prepaid, electronic mail, and/or facsimile to the following:

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s/ Susan Werner

Susan Werner